

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

THIS DOCUMENT APPLIES TO ALL WORLD  
TRADE CENTER DISASTER SITE LITIGATION

**NOTICE OF OBJECTIONS TO  
21 MC 102 COURT DATABASE**

Defendants the City of New York; Board/Department of Education; City University of New York; New York City School Construction Authority; 120 Broadway Condominium (Condo #871); Board of Managers of the 120 Broadway Condominium; Silverstein Properties, Inc.; 120 Broadway Holding, LLC; 120 Broadway Properties, LLC; and 120 Broadway, LLC (collectively, “Defendants”) hereby incorporate by reference any and all prior objections regarding the 21 MC 102 Court Database<sup>1</sup> that were set forth in letters or other submissions to the Court, Special Masters Aaron D. Twerski and James A. Henderson, Jr., and/or Plaintiffs’ Counsel.

Dated: September 13, 2011

Respectfully submitted,

/s/ James E. Tyrrell, Jr.  
James E. Tyrrell, Jr., Esq.  
PATTON BOGGS LLP  
1185 Avenue of the Americas  
30<sup>th</sup> Floor  
New York, NY 10036  
(646) 557-5100  
-and-  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102  
(973) 848-5600

/s/ Thomas A. Egan  
Thomas A. Egan, Esq.  
FLEMMING ZULACK WILLIAMSON  
ZAUDERER LLP  
One Liberty Plaza  
New York, NY 10006-1404  
(212) 412-9500

*Attorneys for the City of New York; Board/Department of Education; City University of New York; New York City School Construction Authority*

*Attorneys for 120 Broadway Condominium (Condo #871); Board of Managers of the 120 Broadway Condominium; Silverstein Properties, Inc.; 120 Broadway Holding, LLC; 120 Broadway Properties, LLC; and 120 Broadway, LLC*

---

<sup>1</sup> The “21 MC 102 Court Database” refers to the database framework the Special Masters indicated on August 31, 2011 will be recommended to the Court.